

CONTINUATION IN SUPPORT OF
A CRIMINAL COMPLAINT

I, Special Agent Mallorie Campbell, being first duly sworn, hereby state:

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been since December of 2021. I am currently assigned to the Detroit Field Division, Grand Rapids Field Office. I am also a participating member of the City of Kalamazoo Department of Public Safety (KDPS) Kalamazoo Valley Enforcement Team (KVET). I have had extensive training at the Federal Law Enforcement Training Center in both the Criminal Investigator Training Program and ATF Special Agent Basic Training.

2. Prior to becoming a Special Agent with ATF, I was employed as a Sheriff's Deputy with the Jefferson County Sheriff's Office in Louisville, KY, for approximately eight years. While with the Jefferson County Sheriff's Office, I was assigned to the Federal Bureau of Investigation's Louisville, Kentucky, White Collar Crimes Task Force for approximately four years. As an FBI TFO and as a Special Agent with the ATF, I have participated in numerous state and federal investigations to include firearms cases, financial crimes, healthcare fraud, illegal narcotics investigations, gang investigations, and human trafficking investigations, among others.

3. I make this affidavit from personal knowledge based on my participation in this investigation, including interviews conducted by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, review of reports by myself and/or other law enforcement agents, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware relating to this investigation.

4. ATF and KDPS are currently investigating Bilal Rashaad MCDANIEL a multi convicted felon, who is alleged to have been in possession of one (1) firearm, said firearm having

previously travelled in interstate commerce in violation of Title 18 United States Code, section 922(g)(1). Bilal MCDANIEL has been convicted of the following felony offenses:

- a. 2016- Felony Weapons- Carrying Concealed
- b. 2018- Felony Weapons- Carrying Concealed
- c. 2018- Felony Weapons- Carrying Concealed

PROBABLE CAUSE

5. Around the fourth week of October KVET Investigators began conducting covert surveillance of MCDANIEL as he had been identified as a person of interest in a KDPS investigation. Investigators identified MCDANIEL's residence, 1116 Bridge Street, Kalamazoo, MI, where MCDANIEL lived with, Karlisha Fox, and their infant child. Investigators observed MCDANIEL carrying a blue duffle bag and conducting what appeared to be hand-to-hand drug transactions on multiple occasions.

6. On October 23, 2023, Investigators observed MCDANIEL travel to On Target Guns and Gunsmithing in Oshtemo, MI, where MCDANIEL purchased .45 ACP ammunition and a handgun magazine. Video surveillance from On Target showed MCDANIEL selecting and purchasing the ammunition, the magazine, and carrying them out of the store. Based on MCDANIEL'S felony status, an arrest warrant for felon in possession of ammunition was obtained on October 24, 2023, from the State of Michigan 8th District Court, along with a search warrant for his residence.

7. On October 25, 2023, Investigators went to 1116 Bridge Street, Kalamazoo, MI, to execute the warrant. As they were preparing to do so, MCDANIEL exited the home, carrying a blue duffle bag. MCDANIEL placed the duffle bag into a black Toyota Rav 4 rental vehicle and prepared to depart. MCDANIEL was subsequently arrested for four (4) open and valid arrest warrants. Investigators searched the duffle bag and found social security paperwork addressed to MCDANIEL, distribution amounts of marijuana, and a Ruger, model p97, .45 caliber handgun.

8. On October 26, 2023, I spoke with Special Agent Timothy Hunt who is recognized by the ATF as having expertise in the interstate nexus of firearms. Based on the information

provided and without physically inspecting the firearms, Special Agent Hunt determined the Ruger pistol meets the definition of a firearm, as defined in 18 U.S.C. § 921(a)(3), was manufactured outside the State of Michigan, and therefore had traveled in and affected interstate commerce.

CONCLUSION

9. Based upon the facts stated herein, there is probable cause to believe that Bilal MCDANIEL, a convicted felon, did knowingly and intentionally possess a firearm in violation of 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm). These violations occurred in the Western District of Michigan.